

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
CASE NO.: 1:17-MD-2804**

This document applies to:

Hon. Dan A. Polster

**Gretna City, Westwego City, and Jean
Lafitte Town**

Plaintiffs,

v.

Purdue Pharma, L.P., et al.

Defendants

Case Nos.: 2:19-cv-00329

2:19-cv-00366

2:19-cv-00374

**MOTION FOR EXTENSION OF TIME WITHIN WHICH TO COMPLY
WITH ORDER REGARDING SHORT FORM FOR SUPPLEMENTING COMPLAINTS
AND AMENDING DEFENDANTS**

NOW INTO COURT, through undersigned counsel, comes Plaintiffs, the Cities of Gretna and Westwego and the town of Jean Lafitte, who move this Honorable Court for an order extending the deadline to file Plaintiffs' "Short Form for Supplementing Complaints and Amending Defendants" pursuant to the Court's *Opinion and Order* ("*Short Form Order*") dated January 18, 2019 (*Rec. Doc.* 1282). In support thereof, Plaintiffs state as follows:

The *Short Form Order* provided all plaintiffs with MDL cases, "other than those identified in paragraphs 2 and 3 of CMO 1," an extension until March 16, 2019, "to amend their pleadings as a matter of right for matters both relying on and beyond the ARCOS data." *Short Form Order*, *ECF Doc.* 1282, p. 2. The procedure set out in the *Short Form Order* allows

Plaintiffs to add or remove Defendants based on ARCOS data, and to incorporate by reference the common factual allegations and RICO claims set forth in the pleadings in *County of Summit, Ohio*, case number 1:18-op-45090. *Id.* at 3.

Plaintiffs intend to utilize the procedure set out by the *Short Form Order*, but respectfully request that their deadline to do so be extended an additional 30 days. The Order was issued on January 18, 2019 and provide two (2) months for Plaintiffs to comply. However, at the time the Court issued this Order, Plaintiffs were not yet involved in this MDL. Plaintiffs were brought into this case via Conditional Transfer Order (CTO-77) on February 5, 2019.

Plaintiffs' counsel is making a good faith effort to review the ARCOS database to ensure that applicable Defendants are incorporated into this case without overreaching and adopting a "shotgun" approach to naming parties.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant their Motion to Extend the March 16, 2019 deadline for an additional 30 days.

Respectfully Submitted,

COLVIN LAW FIRM
(A Professional Law Corporation)

/s/ Benjamin T. Sanders

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

New Orleans, Louisiana, this 15th day of March, 2019.

/s/ Benjamin T. Sanders

Benjamin T. Sanders